

March 24, 2023

VIA ECF

The Honorable Sarah L. Cave
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Catherine McKoy, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS) (SLC)

Dear Judge Cave:

We write jointly pursuant to the Court's March 8, 2023 Order, ECF 525, to report that the parties have completed all expert witness depositions and the two-hour deposition of ACN executive Robert Stevanovski. Accordingly, all discovery has now been completed.

Additionally, the parties have conferred and at this time, the parties do not believe that a settlement conference would be productive and plan to proceed to dispositive motions.

The parties thank the Court for its attention to this matter.

The Court appreciates the parties' cooperation and certification
of the completion of the outstanding discovery.

SO ORDERED 03/24/23


SARAH L. CAVE
United States Magistrate Judge

Respectfully submitted,

/s/ John C. Quinn

Roberta A. Kaplan
John C. Quinn
Christopher R. Le Coney
Maximillian Feldman

KAPLAN HECKER & FINK LLP
350 Fifth Avenue, 63rd Floor
New York, New York 10118
Telephone: (212) 763-0883
Facsimile: (212) 564-0883
rkaplan@kaplanhecker.com
jquinn@kaplanhecker.com
[cleconey@kaplanhecker.com](mailto:cleckoney@kaplanhecker.com)
mfeldman@kaplanhecker.com

Andrew G. Celli, Jr.
Matthew D. Brinckerhoff
O. Andrew F. Wilson
David Berman
Nick Bourland

EMERY CELLI BRINCKERHOFF ABADY
WARD & MAAZEL LLP
600 Fifth Avenue at Rockefeller Center
New York, NY 10020
Telephone: (212) 763-5000
acelli@ecbawm.com
mbrinckerhoff@ecbawm.com
awilson@ecbawm.com
dberman@ecbawm.com
nbourland@ecbawm.com

Counsel for Plaintiffs

/s/ Peter T. Shapiro

Peter T. Shapiro
LEWIS BRISBOIS BISGAARD
& SMITH LLP
77 Water Street
Suite 2100
New York, NY 10005
peter.shapiro@lewisbrisbois.com

Clifford S. Robert
Michael Farina

ROBERT & ROBERT PLLC
526 RXR Plaza
Uniondale, New York 11556
Telephone: (516) 832-7000
crobert@robertlaw.com
mfarina@robertlaw.com

Counsel for Defendants

Alina Habba

HABBA MADAIO & ASSOCIATES LLP
1430 U.S. Highway 206, Suite 240
Bedminster, NJ 07921
Telephone: (909) 869-1188
ahabba@habbalaw.com

Counsel for Defendant Donald J. Trump, in his personal capacity